

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**PENNYMAC LOAN SERVICES,  
LLC**

**PLAINTIFF**

**vs.**

**CIVIL ACTION NO. 2:19-cv-00193-TBM-MTP**

**INNOVATIVE HOLDINGS, INC.  
d/b/a SITCOMM ARBITRATION  
ASSOCIATION, et al**

**DEFENDANTS**

**PLAZA HOME MORTGAGE, INC.**

**INTERVENOR**

**MOTION TO INTERVENE BY PLAZA HOME MORTGAGE, INC.**

Plaza Home Mortgage, Inc. (“Plaza”) respectfully submits this Motion to Intervene pursuant to Federal Rule of Civil Procedure 24. Plaza submits the following Exhibits in support of its Motion to Intervene:

- a) **Exhibit A:** Proposed Complaint in Intervention in accordance with Fed. R. Civ. P. 24(c); and
- b) **Exhibit B:** Memorandum in Support of Motion to Dismiss in separate action.

In addition, Plaza relies on the arguments and authorities set forth in its accompanying Memorandum of Law. Plaza additionally requests such other and further relief as the Court deems just and appropriate under the circumstances.

Dated: February 8, 2021.

**PLAZA HOME MORTGAGE, INC.**

By: /s/ R. Lane Bobo  
One of its Attorneys

**OF COUNSEL:**

Sheldon G. Alston, MSB #9784  
R. Lane Bobo, MSB #105263  
BRUNINI, GRANTHAM, GROWER & HEWES, PLLC  
190 East Capitol Street, Suite 100 (39201)  
Post Office Box 119  
Jackson, MS 39205-0119  
Telephone: (601) 948-3101  
Facsimile: (601) 960-6902  
[salston@brunini.com](mailto:salston@brunini.com)  
[lbobo@brunini.com](mailto:lbobo@brunini.com)

**CERTIFICATE OF SERVICE**

I, R. Lane Bobo, hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record. In addition, I hereby certify that I have this day served the below referenced individuals with a copy of the foregoing pleading via certified mail/Fedex.

Ronnie Kahapea  
P.O. Box 875  
Volcano, HI 96785

Mark Johnson  
451 May Lane  
Louisa, VA 23093

Kirk Gibbs  
4115 Lawrenceville Rd.  
PMB 8119  
Lilburn, GA 30047

Sandra Goulette  
3007 Crescent Hill Drive  
Laurel, MS 39440

Mark Moffett  
345 Coon Jeffcoat Road  
Soso, MS 39480

Rance Magee  
11294 Rose Road  
Emmett, MI 48022

Innovated Holdings, Inc. dba Sitcomm Arbitration Association C/O Registered Agents,  
Inc. 30 N. Gould Street, Suite R Sheridan, WY 82801

Brett "Eeon" Jones  
304 S. Jones Blvd.  
Las Vegas, NV 89107

Dated: February 8, 2021.

/s/ R. Lane Bobo

R. LANE BOBO